

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

LUDWIG CRISS ZELAYA ROMERO,
MARIO GUILLERMO MEJIA VARGAS,
JUAN MANUEL AVILA MEZA,
CARLOS JOSE ZAVALA VELASQUEZ,
VICTOR OSWALDO LOPEZ FLORES, and
JORGE ALFREDO CRUZ CHAVEZ,

Defendants.

DECLARATION

S1 15 Cr. 174 (LGS)

I, EMIL J. BOVE III, pursuant to Title 28, United States Code, Section 1746,
declare under penalty of perjury:

1. I am an attorney admitted to the bar of the State of New York and the bar of this Court, and I am one of the Assistant United States Attorneys for the Southern District of New York responsible for this matter. I respectfully submit this declaration pursuant to Local Rule 16.1 in support of the Government's January 13, 2017 motion to compel reciprocal discovery.

2. By email dated January 9, 2017, which was sent to all defense counsel, I renewed the Government's request for reciprocal discovery, invited counsel to discuss the matter, and notified counsel of the Government's intention to file a motion to compel production of reciprocal discovery if materials were not provided by January 12, 2017. As far as I am aware, no defense counsel responded to the email in any way, and no discovery was produced by the defense.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing information is true and correct.

Dated: New York, New York
January 13, 2017



EMIL J. BOVE III
Assistant United States Attorney